

1 SUPPORTING STATEMENT B FOR PAPERWORK REDUCTION ACT SUBMISSION

Alaska Migratory Bird Subsistence Harvest Household Survey OMB Control Number 1018-0124

Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. The following documentation should be included in Supporting Statement B to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Sampling Universe

Starting in 2016, the revised sampling design uses harvest estimates for 5 regions, which account for about 90% of the Alaska-wide subsistence harvest of migratory birds, as an index to the Alaska-wide harvest (Naves et al. 2021a). The 5 surveyed regions are: Bristol Bay, Yukon-Kuskokwim Delta, Bering Strait-Norton Sound, Interior Alaska, and North Slope. Sub-regions are no longer used.

Participation in the survey is voluntary at the community and household levels. For each survey year, if a selected community declines to participate or cannot be surveyed because of a major logistical constraint, an alternate community is selected. Following the geographic route established for the systematic random sampling of communities, the first alternate community is the one immediately before the originally selected community. If a first-alternate community declines to participate or cannot be surveyed because of a major logistical constraint, the community immediately after the originally selected community is selected as the second alternate. Within communities, if a selected household declines to participate or cannot be contacted after three reasonable attempts, an alternate household is randomly selected, and this process is repeated until the household sampling goal is met.

Aside the revised 5-regions design, the Cordova harvest survey started 2014 and continues to be conducted annually as required by Federal harvest regulations for the Gulf of Alaska region. Households in the communities of Cordova, Tatitlek, and Chenega that intend to participate in this harvest are required to register. At the end of the harvest season, a harvest report form is mailed to all registered households. Survey reminders are mailed 30 and 60 days after the initial mailing to registered households that had not yet provided completed surveys. Harvests reported in returned surveys are extrapolated to non-returned surveys using statistical methods.

Starting in 2021, a mail survey akin to that conducted for the Cordova harvest has been implemented for the Kodiak Island roaded area harvest as required by updated federal

regulations for the Kodiak Archipelago region. To participate in the Kodiak roaded area harvest, harvesters are required to obtain a permit and to complete a harvest report form, even if they did not harvest. Staff from the Alaska Department of Fish and Game (ADF&G) Division of Subsistence worked in close collaboration with the Sun’aq Tribe of Kodiak to develop the permit and harvest reporting system. The Sun’aq Tribe requested in-season harvest reporting. Permits are issued by the Sun’aq Tribe.

The Kodiak roaded area in-season harvest report is provided to permit holders at the time the permit is issued. Harvesters are required to record their harvest using the in-season form along the season. At the end of the season (early Sep), all permit holders are required to submit the completed form indicating whether they harvested birds and eggs, and if so, the kinds and amounts of birds and eggs harvested. Permit holders submit the completed form by mail to the ADF&G for data analysis (the form includes the return address and is postage-paid). To ensure a more complete harvest reporting, the ADF&G mails a post-season harvest survey to permit holders who did not submit a completed in-season report. The post-season mail survey includes two reminders. Reported harvests are extrapolated to represent all permit holders based on statistical methods.

Table 1.1. Sampling design and sampling universe

Region	Total communities	Total households	Total communities/parcels ¹	Communities/parcels to be surveyed	Households to be surveyed in each community/parcel	Total households to be surveyed
5-Regions Index (in-person survey)						
Bristol Bay	31	2,303	33	6	20	120
Yukon-Kuskokwim	47	6,559	58	20	20	400
Delta						
Bering Strait-Norton Sound	16	3,082	23	6	30	180
North Slope	8	1,959	14	4	40	160
Interior Alaska	48	2,872	43	7	20	140
Total	150	16,775	171	43	-	1,000
Cordova Harvest (mail survey)						
Gulf of Alaska	3	1,009	3	3	all registered ²	all registered
Kodiak roaded area (mail survey)						
Kodiak Archipelago	-	-	-	-	all permit holders ³	all permit holders ³

Source: Otis and Naves (2019)

1: “Communities/parcels” refer to sampling units, accounting for (a) division of large communities into parcels and (b) communities with fewer than 10 households, which were excluded from the sampling frame. Total households per community based on 2010 census.

2: In 2014–2022, the average number of registered households was 38.2 (range= 20–63).

3: In 2021-2022 the number of permit holders was 46 and 58.

Community Participation Rate

Community consent to conduct surveys is granted as tribal resolutions. The community participation rate was calculated as the number of communities that agreed to participate divided by the number of communities where contact was attempted. The number of communities where contact was attempted included (a) communities that agreed to participate, (b) communities that did not agree to participate, and (c) communities where multiple contact

attempts were made without a response. No response from communities may suggest lack of interest or willingness to participate in the survey, but it also may also be related to conditions proper to individual communities not related to the survey (e.g., tribal office not staffed, malfunction of local communication systems). Thus, as calculated, the community participation rates may underestimate communities' willingness to participate in the survey. Because it is often difficult to differentiate between causes of no-response, a conservative approach was chosen to calculate community participation rates.

Table 1.2. Community participation rate, including Cordova harvest.

Survey Year	Communities contacted	Communities that agreed to participate	Participation rate
2010	62	56	0.90
2011	33	32	0.97
2012	3	3	1.00
2013	23	21	0.91
2014	7	7	1.00
2015	23	19	0.83
2016	56	48	0.86
2017	56	50	0.89
2018	50	45	0.90
2019	43	40	0.93
Overall 2010-2019	-	-	0.92

Note: Information on community participation rate is not available for 2004–2009. In 2020–2021 the AMBCC canceled the 5-regions survey due to the COVID-19 pandemic. In 2022–2023 the AMBCC canceled the 5-regions survey due to insufficient funds and internal issues. Harvest monitoring was conducted in 2020–2023 for the Cordova harvest and 2021–2023 for the Kodiak Island roaded area harvest.

Household Response/Participation Rate

In communities surveyed by in-person interviews (5-regions survey), the household participation rate was calculated as the number of households that agreed to participate divided by the number of households contacted. In the Cordova mail-out survey, the household participation rate was calculated as the proportion of registered households that provided a completed survey.

The overall household participation rate was 88% in 2004–2019, which is similar to other subsistence harvest surveys conducted in Alaska. For instance, overall response rates of 80%, 86%, and 84% occurred in three consecutive years of a study that assessed effects of development along Alaska's outer continental shelf on harvests (Fall and Utermohle 1995: 112). Survey outreach and communication efforts can improve community and household participation, while issues related to hunting regulations and law enforcement efforts can reduce participation in surveys.

Table 1.3. Household participation rate, 5-regions survey.

Survey Year	Households contacted	Households that agreed to participate	Participation rate
2004	1,615	1,320	0.82

Survey Year	Households contacted	Households that agreed to participate	Participation rate
2005	2,130	1,847	0.87
2006	1,903	1,605	0.84
2007	1,718	1,449	0.84
2008	1,101	962	0.87
2009	714	429	0.60
2010	2,005	1,826	0.91
2011	1,183	1,130	0.96
2012	272	262	0.96
2013	521	513	0.98
2014	264	254	0.96
2015	950	898	0.95
2016	486	451	0.93
2017	692	655	0.95
2018	639	604	0.95
2019	757	706	0.93
Overall 2004-2019	16,950	14,911	0.89

Note: In 2020–2023 the AMBCC canceled the 5-regions survey due to the COVID-19 pandemic and other operational issues.

Table 1.4. Response rate, registered households, Cordova harvest.

Participation	2014	2015	2016	2017	2018	2019	2020	2021	2022
Registered households	36	20	26	27	41	31	60	63	40
Surveys completed	28	15	22	25	33	23	44	48	30
Participation rate	0.78	0.75	0.85	0.93	0.81	0.74	0.73	0.76	0.75

Table 1.5. Response rate, individual permits, Kodiak Island roaded area harvest.

Participation	2021	2022
Permits issued	46	58
Permits reported	42	51
Participation rate	0.91	0.88

2. Describe the procedures for the collection of information including:

- * **Statistical methodology for stratification and sample selection,**
- * **Estimation procedure,**
- * **Degree of accuracy needed for the purpose described in the justification,**
- * **Unusual problems requiring specialized sampling procedures, and**
- * **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The 5-regions survey uses a stratified, two-stage sampling design. The distribution of the sampling effort (Table 1.1) was based on multiple rounds of optimal allocation analyses accounting for variance in harvest estimates and survey costs (Otis and Naves 2019). Regions are considered strata. Within each region, communities are first-stage sampling units and households are second-stage sampling units. For each region and year, a systematic random sample of communities is selected to be surveyed. With the objective of obtaining a geographically dispersed set of communities, in each region, communities were sequentially numbered following a geographic route (south to north, coastal to inland). A starting-point community is randomly selected, which defines the other selected communities (e.g., every 4th community in the sequentially numbered route). Communities are selected randomly regardless of their total number of households. Optimal allocation analyses were conducted to allocate the sampling effort, i.e., the number of communities and households to be sampled in each region (Otis et al. 2017).

Communities with more than 200 households were divided into parcels so that individual parcels had a maximum of 200 households. For purposes of sampling, each parcel is treated as an individual community. The number of parcels per community was based on the 2010 census; it is fixed across years and will be updated based on the 2020 census. Communities with fewer than 10 households in the 2010 census and in the 2011–2015 population estimates were excluded from the sampling frame (U.S. Census Bureau 2011; ADLWD n.d.).

*** Estimation procedure,**

Formulas used to calculate estimated harvest, variance, and confidence interval percentage (Naves and Keating 2018a):

Community estimated harvest

$$\hat{Y}_i = \frac{M_i}{m_i} \times \sum_{j=1}^{m_i} y_{ij}$$

(Equation 1)

Region estimated harvest

$$\hat{Y}_{reg} = \frac{N}{n} \sum_{i=1}^n \hat{Y}_i$$

(Equation 2)

Region variance

$$v(\hat{Y}_{reg}) = \frac{N^2(1-f_1)}{n} s_u^2 + \frac{N}{n} \sum_{i=1}^n \frac{M_i^2(1-f_{2i}) s_i^2}{m_i}$$

(Equation 3.a)

$$s_u^2 = \frac{1}{n-1} \sum_{i=1}^n (\hat{Y}_i - \bar{\hat{Y}})^2 \quad s_i^2 = \frac{1}{m_i-1} \sum_{j=1}^{m_i} (y_{ij} - \bar{y}_i)^2$$

(Equation 3.b) (Equation 3.c)

$$\bar{y}_i = \frac{\sum_{j=1}^{m_i} y_{ij}}{m_i}$$

$$\bar{\hat{Y}}_{reg} = \frac{\sum_{i=1}^n \hat{Y}_i}{n}$$

(Equation 3.d) (Equation 3.e)

Alaska-wide estimated harvest

$$\hat{Y}_{AK} = \sum_{R=1}^{reg} \hat{Y}_{reg}$$

(Equation 4)

Alaska-wide variance

$$v(\hat{Y}_{AK}) = \sum_{R=1}^{reg} v(\hat{Y}_{reg})$$

(Equation 5)

Confidence interval at region and Alaska-wide levels

$$CIP(\hat{Y}) = 2 \times CV \quad CV(\hat{Y}) = \frac{\sqrt{v(\hat{Y})}}{\hat{Y}}$$

(Equation 6.a) (Equation 6.b)

- i* = communities in a region (primary sampling units)
- j* = households in a community (secondary sampling units)
- reg* = region
- AK* = Alaska-wide

\hat{Y} = estimated harvest

y_{ij} = harvest reported by j^{th} surveyed household in the i^{th} community

$\bar{\hat{Y}}_{reg}$

= average community harvest in a region

\bar{y}_i = mean household harvest in sampled community i

m = sampled households

M = total households

n = sampled communities in region

N = total communities in region

R = number of regions

$v(\hat{Y})$ = variance of harvest estimate

f_1 = sampling fraction in regions (n/N)

f_{2i} = sampling fraction in communities (m_i/M_i)

s_i^2 = variance among households in a community

s_u^2 = variance among communities in a region

$CIP(\hat{Y})$

= confidence interval as a percentage of the harvest estimate

$CV(\hat{Y})$

= coefficient of variation

*** Degree of accuracy needed for the purpose described in the justification,**

Based on survey objectives and priorities, AMBCC partners have agreed on the goal for the confidence interval to be around 50% of harvest estimates for commonly-harvested species (George et al. 2015, Otis et al. 2016).

*** Unusual problems requiring specialized sampling procedures,**

The subsistence harvest survey covers a large geographic area and a large number of species. Some species are abundant and harvested in relatively large numbers. Other species are harvested only occasionally because they have small populations, restricted distribution, or are not widely used for subsistence purposes. Wide-coverage sampling designs such as the AMBCC survey cannot address both commonly- and rarely-harvested species with the same level of precision (Copp and Roy 1986:11, H-15). Few data points for rarely-harvested species may result in less accurate harvest estimates and wider confidence intervals as compared to commonly-harvested species. Dedicated harvest studies and analytical procedures can allow improved harvest estimates for species that have small populations, low densities, or limited distributions, and are harvest in relatively low numbers or infrequently. Data collected in this survey have been used in such dedicated studies (e.g., Rothe et al. 2015, Naves and Zeller 2017, Naves 2018, Naves et al. 2019).

*** Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The survey needs to be conducted annually to adequately monitor the effect of annual hunting on populations of migratory birds. Bird populations can change because of droughts, floods, freezes, level of harvest, and ecological conditions in and breeding and wintering grounds. Levels of subsistence harvest also can vary largely because of variations in bird migration patterns, availability of other subsistence resources, socio-economic factors, and river and sea ice conditions affecting access to birds. Regions that contribute to a small proportion of the subsistence harvest of migratory birds in Alaska were not included in the 5-regions index survey. Within the 5 regions that are surveyed annually, a random sample of communities and households are selected each survey year.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

The overall participation rate is 92% for communities (2010–2019) and 84% for households (Tables 1.2–4). The survey is voluntary for communities and households. Annual preliminary harvest estimates are provided to the AMBCC partners at the regional and statewide levels. Further discussion of survey methods, implementation, and results (including potential sources of bias) occur at AMBCC at large and its Harvest Survey Committee. Community and household participation rates are high and we have no indication that nonresponse bias is significantly affecting the survey data.

The spring-summer harvest of migratory birds was unlawful until 2003. Law enforcement issues have occurred in some villages in the 1950s–1970s, and fear and resentment persist. Reliable harvest estimates depend on trust and collaboration between harvesters, surveyors, and the resource management agencies that are conducting the survey. The participation of local residents as surveyors helps increase trust and minimize refusal rates.

Potential sources of bias may occur because (a) local surveyors tend to focus on surveying households with active hunters and (b) non-harvesting households seem to be prone to decline to participate in surveys. Both potential sources of bias could lead to over-estimation of harvest amounts. Field coordinator and surveyor training have stressed the importance of including non-hunting households in the survey and of enlisting their participation, following the random selection of households to be surveyed. Underreporting of take of species of conservation concern is another potential source of bias, but it is difficult to detect and to correct for this potential issue. The likelihood of this potential issue may decrease as hunters become familiar with and develop trust in the co-management process and in the harvest survey.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

The layout of the harvest report form is based on surveys conducted in rural Alaska since the 1980s (Wentworth 2007a, 2007b). A detailed revision of the 2004–2007 survey methods and materials was carried out based on input from the AMBCC Harvest Survey Committee, Native partners, surveyors, field coordinators, and data management and analysis staff (Naves et al. 2008).

An assessment of the survey goals, priorities, and distribution of sampling effort was recently completed under technical leadership of a team of statisticians from the Colorado State University (George et al. 2015, Otis et al. 2016). The main objective of this review was to adjust sampling effort and costs, so they are compatible with funding available.

5. Provide the names and telephone numbers of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Original survey methods (2004–2009):

John Copp

1773 NW 129th Place
Portland, OR 97227
phone (503) 641-3407

Paul Padding

USFWS Migratory Bird Management
Laurel, MD 20708
phone (301) 497-5980
paul_padding@fws.gov

Robert Stehn

USFWS Migratory Bird Management,
Wildlife Biologist-Biometrician
1011 E Tudor Rd, Anchorage, AK 99503
phone (907) 786-3504
robert_stehn@fws.gov

Virgene Hanna

University of Alaska Anchorage, Institute of
Social and Economic Research,
Survey Research Director
3211 Providence Drive, Anchorage, AK 99508
phone (907) 786-7706
anhv@uaa.alaska.edu

Joel Reynolds, PhD

Solution Statistical Consulting
6601 Chevigny St,
Anchorage, AK 99502
solutionsconsulting@ak.net

Revised survey methods I (2010–2015):

Liliana Naves, PhD

ADF&G Division of Subsistence
Research Analyst IV, AMBCC Harvest Assessment
Program Coordinator
333 Raspberry Rd, Anchorage, AK 99518
phone (907) 267-2302
liliana.naves@alaska.gov

Jim Fall, PhD

ADF&G Division of Subsistence,
Research Program Director
333 Raspberry Rd, Anchorage, AK 99518
phone (907) 267-2359
jim.fall@alaska.gov

David Koster

ADF&G Division of Subsistence,
Resource Analyst IV, Information Management Unit
333 Raspberry Rd, Anchorage, AK 99518
phone (907) 267-2371
david.koster@alaska.gov

Molly Chythlook

Bristol Bay Native Association,
Natural Resources Director
Chair of AMBCC Harvest Survey Committee
P.O. Box 210, Dillingham, AK 99576
phone (907) 842-5257
mchythlook@bbna.com

Revised survey methods II (2016–present):

T Luke George, PhD

David Otis, PhD

Colorado State University, Department of Fish,
Wildlife, and Conservation Biology
Fort Collins, CO 80524
phone (970)491-6597
paul.doherty@colostate.edu

Colorado State University, Department of Fish,
Wildlife, and Conservation Biology
Fort Collins, CO 80524
phone (970)682-1837
dotiscsu@rams.colostate.edu

Paul Doherty, PhD

Colorado State University, Department of Fish,
Wildlife, and Conservation Biology
Fort Collins, CO 80524
phone (970)226-9170
t.luke.george@colostate.edu

Since 2009, the ADF&G Division of Subsistence coordinates the Harvest Assessment Program on behalf of the AMBCC. Staff of the ADF&G Division of Subsistence coordinate the annual data collection and provide data management, analysis, and reporting services. Below are key staff involved with the AMBCC Harvest Assessment Program:

Liliana Naves, PhD

ADF&G Division of Subsistence
Research Analyst IV
333 Raspberry Rd, Anchorage, AK 99518
phone (907) 267-2302
liliana.naves@alaska.gov

David Koster

ADF&G Division of Subsistence
Resource Analyst IV
333 Raspberry Rd, Anchorage, AK 99518
phone (907) 267-2371
david.koster@alaska.gov

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